

BETY JAVIDZAD (SBN 240598)
bety.javidzad@dentons.com
DENTONS US LLP
601 South Figueroa Street, Suite 2500
Los Angeles, California 90017-5704
Telephone: (213) 623-9300
Facsimile: (213) 623-9924

Attorney for Defendant
MSC Merchant Service Center, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

ABANTE ROOTER AND
PLUMBING, INC., a California
corporation, individually and on
behalf of all others similarly
situated

Plaintiff.

vs.

MSC MERCHANT SERVICE
CENTER, LLC, a Nevada limited
liability company.

Defendant.

| No. 3:19-cv-07965

**SECOND STIPULATION TO
EXTEND TIME TO RESPOND TO
INITIAL COMPLAINT**

Service: December 12, 2019
Current response date: February 3, 2020
New response date: February 28, 2020

Defendant MSC Merchant Service Center, LLC (“Defendant”) on the one hand, by and through its attorney of record, and Abante Rooter and Plumbing, Inc. (“Plaintiff”) on the other hand, by and through its attorneys of record, hereby stipulate and agree as follows:

RECITALS

1. February 3, 2020, was the deadline for Defendant to answer or otherwise

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

respond to the Complaint; and

2. Defendant needs additional time to discuss this matter with opposing counsel and/or retain new counsel for this matter.

NOW THEREFORE, in consideration of the facts set forth above, the parties hereby stipulate and agree as follows:

1. The deadline for Defendant to answer or otherwise respond to the Complaint shall be continued to February 28, 2020; and

2. Defendant does not waive any defenses to the Complaint or its right to move to dismiss the Complaint.

IT IS SO STIPULATED.

Dated: January 29, 2020

DENTONS US LLP

By: /s/ Bety Javidzad
Bety Javidzad

Attorney for Defendant

Dated: January 29, 2020

WOODBROW & PELLUS LLC

By: /s/ Taylor Smith
Taylor Smith

Attorney for Plaintiff

113917369